

REMARKS:

Please reconsider the present application in view of the above amendments and following remarks. Applicant thanks the Examiner for carefully considering the present application.

Claims 1-64 are pending and stand rejected. Claims 21 is amended herein.¹ Claims 1-64 are pending upon entry of this amendment.

Response to Rejection Under 35 USC § 112

Claim 21 stand rejected under 35 USC § 112 as being indefinite for allegedly failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Particularly, the Examiner asserted that the phrase “may be” previously recited in claim 21 renders the claim indefinite.

Applicants respectfully submit that claim 21 was proper as previously filed. Nevertheless, to expedite prosecution Applicants have amended claim 21 by replacing the phrase “may be” with the word “is.” Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection under 35 USC § 112.

Response to Rejection Under 35 USC § 103(a) in View of Bezos, Goedken, and Yokell

Claims 1-10, 12-21, 23-40, 42-56, and 58-64 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over U.S. Patent 6,029,141 to Bezos et al. (“Bezos”) in view of U.S. Patent Application Publication No. 2002/0082960 to Goedken (“Goedken”). Dependent claims 11, 22, 41, and 57 stand rejected under 35 USC § 103(a) as allegedly being

¹ Applicants amended claim 33 in an Amendment After Final filed July 31, 2006. Applicants assume this amendment was entered because checkbox labeled “The proposed amendment ... will not be entered” in Advisory Action of August 8, 2006 is unchecked.

unpatentable over Bezos in view of Goedken, and further in view of U.S. Patent 6,507,870 to Yokell et al. ("Yokell"). This rejection is traversed.

Independent claim 1 as filed recites:

- A method for providing enterprise event marketing and management automation comprising the steps of:
- (a) providing a website including online tools for event marketing and management;
 - (b) allowing a user in communication with the website to create a plurality of event pages describing an event and a registration page associated with the event utilizing the online tools, each of the plurality of event pages being targeted to one of a plurality of participant groups, each of the plurality of participant groups comprising one or more participants, the event pages including a link to the registration page;
 - (c) forwarding a first event page of the plurality of event pages to a first participant of a first participant group to enable the first participant to establish a first communication with the registration page utilizing the link;
 - (d) forwarding the registration page to the first participant to be completed and returned in response to the first communication;
 - (e) forwarding a second event page of the plurality of event pages to a second participant of a second participant group to enable the second participant to establish a second communication with the registration page utilizing the link, the first event page being different from the second event page, the first participant group being different from the second participant group;
 - (f) forwarding the registration page to the second participant to be completed and returned in response to the second communication;
 - (g) receiving the registration page and in response thereto communicating confirmations to the first and second participants; and
 - (h) communicating to the user the information received from the first and second participants.

This claimed method is beneficial in that it provides a user who organizes an event a website providing all the tools the user needs to create pages about the event (multiple event pages and a registration page). The method forwards the pages to participants of the event

for their responses, and communicates the responses back to the user. Independent claims 33 and 49 recite similar features and have similar benefits.

The cited references, Bezos, Goedken, and Yokell, either alone or in combination, fail to disclose the claimed invention recited in independent claim 1. Particularly, Bezos fails to disclose claimed element (b), which recites “allowing a user in communication with the website to create a plurality of event pages describing an event and a registration page associated with the event utilizing the online tools, each of the plurality of event pages being targeted to one of a plurality of participant groups, each of the plurality of participant groups comprising one or more participants, the event pages including a link to the registration page.” Bezos, in contrast, discloses an Internet-based referral system where applicants can enroll to become associates of the referral system by visiting a merchant website. See Bezos, Abstract.

The Examiner cited FIG. 1 and col. 9, line 41 through col. 10, line 62 of Bezos for the teaching of the above cited claim features. However, the cited figure and sections of Bezos merely describe an architecture for an Internet-based referral system for a merchant website and an enrolling process for an applicant to become an associate of the referral system. The architecture and the process do not disclose the event pages, the registration page, or the step of allowing a user to create these pages. The Examiner apparently treated the claimed website as equivalent to the merchant’s website in Bezos (see rejection of claim element (a)), the claimed online tools for event marketing and management equivalent to the enrollment software (see rejection of claim element (a)), and the claimed registration page equivalent to the application documents in Bezos (see rejection of claim elements (d) and (f)). Even under the Examiner’s own interpretation, Bezos still fails to disclose or suggest the claimed event

pages “describing an event ..., each of the plurality of event pages being targeted to one of a plurality of participant groups, ... the event pages including a link to the registration page.” It appears the Examiner deems “the merchant web page 136 containing online registration instructions” equivalent to the event pages. See Bezos, col. 10, lines 1-9. However, the cited sections and figure do not disclose whether the web page 136 is “targeted to one of a plurality of participant groups, each of the plurality of participant groups comprising one or more participants” as claimed. In addition, this interpretation of the event pages conflicts with the Examiner’s rejection of elements (c) and (e), in which the Examiner equates the event page with a customer request for a web page in a merchant website. See rejection of claim element (c) and (e), see also Goedken, FIGS 5-7. A request for a web page is a request and not an event page, and does not include “a link to the registration page” as claimed.

Goedken also fails to disclose the claim elements not taught by Bezos. Goedken describes a method for a customer to purchase a product from a merchant website through an associate server that acts as a middleman. The associate server can earn commission and track sales without registering with the merchant website. See Goedken, Abstract. The Goedken system does not teach or disclose allowing a user in communication with a website to create event pages and a registration page utilizing online tools for event marketing and management. The Examiner equates the claimed event pages with the customer’s requests for web pages in Goedken. See rejection of claim elements (c) and (e); see also Goedken, FIGS 5-7. These customer requests are not created utilizing online tools for event marketing and management, and do not include “a link to the registration page” as claimed. Therefore, similar to Bezos, Goedken also fails to disclose element (b) of claim 1.

Yokell also fails to disclose the claimed features not taught by Bezos and Goedken. Yokell discloses a method and system to assist a customer to determine whether or not a local copper loop is qualified for DSL service, and obtain DSL service when the loop is qualified. See Yokell, col. 1, ll. 48-56. The website disclosed in Yokell “allow customers and channel partners to self qualify and on-line order via a web page to determine whether they can receive high speed xDSL services to their home or business.” See Yokell, col. 4, ll. 15-26. The Yokell system fails to disclose or suggest allowing a user in communication with a website to create event pages and a registration page utilizing online tools for event marketing and management as claimed.

Likewise, the combination of Bezos, Goedken, and Yokell also fails to disclose or suggest the claimed features cited above. As discussed above, the above claimed features are not disclosed in any one of the three references. Even if the three references were combined, at best the combination provides a system and method for an Internet-based referral system for a merchant website and an enrolling process for one to become an associate of the referral system and to market a service of qualifying copper loop for DSL service without registering in the merchant website. This does not disclose or suggest element (b) of claim 1 recited above.

In view of the above, Bezos, Goedken, and Yokell, whether considered individually or in combination, fail to disclose each and every limitation recited in independent claim 1. Thus, independent claim 1 is patentable over Bezos, Goedken, and Yokell. Independent claims 33 and 49, and dependent claims, are allowable for at least the same reasons. Accordingly, withdrawal of the § 103 rejections is respectfully requested.

Conclusion

In sum, Applicants respectfully submit that claims 1-64, as presented herein, recite statutory subject matter and are patentably distinguishable over the cited references for the reasons described above. Therefore, Applicants respectfully request allowance of the claims and application.

In addition, Applicants respectfully invite Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,
JUSTIN T. NGUYEN ET AL.

Date: February 14, 2008

By: /Jie Zhang/
Jie Zhang, Reg. No. 60,242
Attorney for Applicants
Fenwick & West LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Tel.: (650) 335-7297
Fax: (650) 938-5200